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5 Attorney for the Plaintiff

6 **UNITED STATES DISTRICT COURT**
7 **FOR THE DISTRICT OF NEVADA**
8

9 **SHENDONNA SOPHIA McLAINE,**

10 **Plaintiff,**

11 **v.**

12 **CLARK COUNTY, NEVADA; *et. al.*,**

13 **Defendants.**
14

)
) **Case No. 2:14-cv-0288-JAD-GWF**
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15 **STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFF TO**
16 **RESPOND TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

17 **(FOURTH REQUEST)**

18 Pursuant to Federal Rules of Civil Procedure 6(b) and the Court's Local Rule of
19 Civil Practice ("LRCP") 7-1, the parties respectfully request that the Court extend the current
20 deadline for Plaintiff to respond to Defendants' motions for summary judgment (Pacer #109 and
21 #110) to and until May 23, 2017 (Tuesday). This is the parties' fourth request for an extension of
22 time. Plaintiff's current deadline is May 19, 2017.

23 In support of this stipulation, the parties wish to advise the Court of the following:

24 1. This is a civil rights case involving five separate Defendants. Each
25 Defendant moved for summary judgment on January 30, 2017.

26 . . .

2. Plaintiff's counsel recently completed a 7-week jury trial in state court that required a significant amount of his time and detracted from his ability to complete responses to the pending motions for summary judgment. While Plaintiff's counsel has commenced drafting responses and made significant progress towards their completion, an additional 2-business days will permit him to complete and file appropriate responses. To this end, undersigned counsel will work over the weekend to ensure their completion and avoid any further extensions of time.

3. Counsel for Defendants do not oppose Plaintiff's request for additional time to respond to the dispositive motions provided they are allowed 30-days to file a reply to any response that may be filed by Plaintiff. Obviously, given his own request, Plaintiff's counsel has no issue with providing Defendants additional time to file replies.

4. The additional time requested herein should provide sufficient time for Plaintiff's counsel to complete and file appropriate responses.

5. The parties respectfully request that the Court approve this stipulation.

Respectfully submitted,

/s/ Lucinda L. Courmou

/s/ Paul S. Padda

Lucinda L. Coumou, Esq.
Chief Deputy District Attorney, Civil Division
Clark County District Attorney's Office

Paul S. Padda, Esq.
Paul Padda Law

Attorney for Plaintiff

Dated: May 19, 2017

Attorney for Defendant Clark County, Nevada

Dated: May 19, 2017

/s/ Noel E. Eidsmore

Robert W. Freeman, Jr., Esq.
Noel E. Eidsmore, Esq.
Lewis Brisbois Bisgaard & Smith

Attorney for Officers Friedman and Zaccara
and the Las Vegas Metropolitan Police Department

Dated: May 19, 2017

1 **IT IS SO ORDERED:**

2 **The Court hereby approves the parties' stipulation for**
3 **extension of the current deadline for responding to the**
4 **motions for summary judgment filed on January 30,**
5 **2017 (Pacer #109 and #110). Plaintiff's responses shall**
6 **be due on or before May 23, 2017 and each Defendant**
7 **shall have 30-days after Plaintiff files a response to**
8 **submit a reply (if any).**

9 
10 **UNITED STATES DISTRICT JUDGE**

11 **Dated: May 19, 2017**

12 **CERTIFICATE OF SERVICE**

13 In compliance with the Court's Local Rules, the undersigned hereby certifies that on May
14 19, 2017 a copy of the foregoing document, "STIPULATION FOR EXTENSION OF TIME FOR
15 PLAINTIFF TO RESPOND TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT"
16 was served (via the Court's CM/ECF system) upon all counsel of record in this litigation.

17 */s/ Paul S. Padda*

18 Paul S. Padda, Esq.